

November 12, 2012

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
Attention: Lorenzo Miller (202-418-0846) or John Emmett (202-418-0386)
445 12th Street, SW,
Room TW-A325
Washington, DC 20554

Re: In the Matter of the Connect America Fund, WC Docket No. 10-90 and High Cost Universal Support, WC Docket No. 05-337; Expedited Waiver Request and Study Area Boundary Submission for South Park Tel Co\_462195

Dear Ms. Dortch,

Pursuant to 47 C.F.R. §1.3, South Park Telephone Company ("South Park"), Study Area 462195, respectfully requests an expedited waiver to correct the study area boundary information for the purpose of establishing certain independent variables used in the quantile regression analysis model for limiting capital and operations expenses in the high cost loop support algorithm ("QRA Caps").

South Park is impacted by the QRA caps and has uncovered inaccuracies in the Federal Communications Commission's ("Commission") representation of its study area boundaries. Therefore, good cause exists for the Commission to grant this waiver request due to the potential ramifications that inaccurate independent variables will have on South Park's high cost loop support calculations, as recognized by the Commission. South Park requests expedited treatment of this waiver to correct the study boundary information and associated independent variables the Commission has on file as allowed in the Benchmark Order. South Park further requests the Commission apply these corrections effective July 1, 2012 to ensure the 90<sup>th</sup> percentile caps on capital and operations expense are accurately reflected for 2012 and 2013.

<sup>&</sup>lt;sup>1</sup> See Connect America Fund, WC Docket No. 10-90; High Cost Universal Service Support, WC Docket No. 05-337, Order, DA 12-646, released April 25, 2012 (*Benchmark Order*), at paras 27 and 29.

<sup>&</sup>lt;sup>2</sup> *Id*.

Enclosed please find a CD containing: 1) a Shape File, and 2) a Readme File (including contact information and a certification statement from a company officer), meeting the Specification for Study Area Boundary Submission as set forth in Appendix C of the Benchmark Order.

Please don't hesitate to contact me with any questions regarding this filing.

Respectfully Submitted,

Stacey Brigham

**TCA** 

Agent for South Park Telephone Company

One (1) Enclosure